

U. S. DEPARTMENT OF ENERGY  
ROCKY FLATS PLANT  
ENVIRONMENTAL RESTORATION PROGRAM WEEKLY REPORT  
WEEK ENDING OCTOBER 2, 1992

Section I - Interagency Agreement

OU 1 - 881 Hillside

Phase III RFI/RI Field Activities -- Work on the OU 1 Draft Phase III RFI/RI Report continues. The chemical analysis data set is now 100% complete. EPA will not approve the Risk Assessment Technical Memo 8, Contaminant Identification.

IRA Operations -- Laboratory results from the discharge of Effluent Tank 207 are scheduled to be received by October 9, 1992.

Testing of the french drain influent piping is in progress. Pneumatic testing of the double wall pipe is complete and no leaks were detected. Further testing of the system will continue.

The total treated groundwater collected is approximately 575,000 gallons, and the total discharged treated groundwater is approximately 435,000 gallons.

OU 2 - 903 Pad, Mound, East Trenches Area

Phase II RFI/RI Field Activities -- Approximately 40 surface soil sample locations have been proposed for the Human Health Risk Assessment (HHRA) to support data requirements.

The Draft Final of Technical Memorandum #5, Exposure Scenarios, is being held by EPA. The regulatory agencies will not review the document until RFO presents a completely new IAG schedule for OU 2. RFO is outlining an overall OU 2 schedule strategy to present to the regulatory agencies which will include the delayed Bedrock field program. A request for a seven-month extension of the OU 2 Phase II RFI/RI Report is under consideration by RFO; this will allow incorporation of the Bedrock field program. A meeting with the regulatory agencies is scheduled for October 5, 1992 to discuss the Bedrock issue and the delay in the OU2 RFI/RI Report..

Field Treatability Unit -- The Field Treatability Unit (FTU) collected, treated and discharged 53,000 gallons of surface water during the week ending September 29, 1992. The FTU continues to operate on a 24-hour manned schedule without problems.

A membrane cleaning was completed on September 30, 1992. The cleaning agent (sulfuric acid/hydrogen peroxide) appears to be very effective in regenerating the microfilter capacity.

The work to winterize the SW132 collection facility was initiated and completed on October 2, 1992.

Volatile Organic Compounds (VOCs) and radionuclide screen samples were obtained from the wet spot in the road adjacent to the SW59 collection point and shipped to an offsite laboratory for analysis on September 28, 1992. An expedited schedule was requested for completing the results.

Smear samples were collected from the influent collection line and analyzed. The results were obtained with the Ludlum equipment, and multiple readings show Alpha and Beta levels at 6 disintegrations per minute (dpm) and below and 12 dpm and below, respectively. A section of pipe will be removed and shipped to an offsite laboratory for radionuclide analysis. A briefing paper will be prepared after receiving all the applicable data relative to the discrepancy on radionuclide data obtained from the influent samples collected.

OU 3 - Offsite Releases--The fall aquatic ecological sampling in the offsite reservoirs started October 2, 1992 and will continue for approximately three weeks.

Work is continuing on EPA's demand to draw a line within OU 3 that determines where construction activities may or may not occur. EPA wants this boundary enforced by DOE until completion of the RFI/RI activities. A risk line based on CERCLA risk 'point of departure' of  $1E-6$  was determined. This line is calculated at 2.6 pCi/g under a residential scenario. A recreational scenario is also being developed. This 2.6 pCi/g line is within the Settlement Agreement lands.

OU 5 - Woman Creek --The Draft Health and Safety Plan (HSP) has been completed for the Environmental Evaluations (EE).

CDH did not attend the September 23, 1992 meeting to discuss Technical Memorandum 1 (TM1), Revised Network Design - Field Sampling Plan, scheduled by CDH with RFO. The meeting is rescheduled for October 7, 1992 at EPA offices in Denver.

Comments sent to HQ on the High Purity Germanium (HPGe) Survey SOP are due back on October 7, 1992. These comments plus comments from EPA will be incorporated into the HPGe survey.

Comments were received on September 26, 1992 from EPA and on September 27, 1992 from HQ on TM2, Surface Geophysics. CDH comments were received August 31, 1992 and have been incorporated. CDH gave conditional approval as has EPA, and their comments along with comments from HQ will be addressed. The geophysical survey is scheduled to begin on October 7, 1992 at the Landfill (IHSS 115).

OU 6 - Walnut Creek -- Progress continues in OU 6 field activities. Surface water sampling in the ponds is in progress. Monitoring well locations were determined and staked and are being screened for radiation contamination. Boring locations for soil sampling were staked.

The HSP for the Environmental Evaluation is expected to be approved by October 6, 1992.

OU 7 - Present Landfill -Documentation and training activities continue as part of field activities mobilization. The HSP is due to be submitted for interim review October 5, 1992.

OU 8 - 700 Area --The regulatory agencies granted an extension for submittal of the OU 8 Final Phase I RFI/RI Work Plan from September 28, 1992 to December 1, 1992. This milestone will be met.

OU 10 - Other Outside Closures-- The Statement of Work (SOW) to implement the OU 10 Phase I RFI/RI Work Plan is being prepared. The responses to the regulatory agencies' comments for the Final Work Plan were prepared and completed on October 1, 1992.

OU 12 - 400/800 Area -- Comment response and resolution are complete for the OU 12 Final Phase I RFI/RI Work Plan. The document went through internal review and will be ready for submittal to the regulatory agencies on October 5, 1992.

A meeting was held September 24, 1992 between DOE, EPA, CDH and EG&G to discuss the proposed FSP for the Industrial Area OUs. In order to get input from the agencies on the FSP, RFO will focus on both the surface water/sediment and groundwater sampling portions. Final approval of the proposal has not been received from the regulatory agencies. Any work on the Industrial Area FSP will be contingent upon approval of the IM/IRA Plan for the Industrial Area.

It was proposed that all Industrial Area OUs be delayed and investigated when issues related to

Decontamination and Decommissioning (D&D) activities are clarified. This would include OUs 8, 9, 12, 13 and 14. This proposal would result in no FY93 funding for field activities that are currently scheduled under the IAG. This proposal is still under consideration.

OU 13 - 100 Area -- Work continues on resolving OU 13 Final Phase I RFI/RI Work Plan comments. A Revised Draft of the OU 13 Work Plan and Comment Response Summary were received on September 16, 1992. RFO completed review and provided comments on the revised draft on September 28, 1992. Comments were completed and consolidated on October 2, 1992. The second review will be completed on October 5, 1992. The Final Phase I RFI/RI Work Plan is due to the regulatory agencies on October 12, 1992, the IAG milestone date.

OU 14 - Radioactive Sites -- Comments on the OU 14 Draft Phase I RFI/RI Work Plan were received from the regulatory agencies on September 24 and September 28, respectively. Resolution and incorporation of the comments began October 2, 1992.

Preparation of the SOW to perform the OU 14 Remedial Investigation field work has begun. Work will proceed until final resolution of the FY93 work content for the program.

OU 15 - Inside Building Closures -- A September 24, 1992 meeting was held among RFO, CDH and EG&G to discuss the regulatory agencies' comments on the OU 15 Final Phase I RFI/RI Work Plan; questions regarding comments were resolved with CDH. EPA did not attend the meeting. Submittal of the OU 15 Final Phase I RFI/RI Work Plan will meet the scheduled October 26, 1992 IAG Milestone.

#### Sitewide Activities

Sitewide Treatability Studies on Ion Exchange and Adsorption -- A draft copy of the work study was delivered to RFP from the subcontractor on September 28, 1992. The Ion Exchange Treatability Study is back in place for FY93; however, due to the shifting nature of the budget this could still be subject to change.

#### Other Activities

Contractor Yard -- Work on the permanent power connections to the trailers in the contractor yard is complete.

PA Decon Pad -- The concrete pour for the equipment wash-down pad was completed October 2, 1992.

Landfill Decon Pad -- The Project Management Plan (PMP) is still being reviewed by RFO. The Title II design will begin following the approval of the PMP. Construction is expected to begin February 1993 and will be completed by April 1993.

#### Work Package Reviews

RFO senior staff reviewed EG&G's FY93 ER Program Work Packages on September 29, 1992. Some modifications to the Work Packages will be performed prior to the scheduled review by HQ during on October 7, 1992.

#### ICE Reconciliation Meeting

Representatives from PR-24 and their contractor, Gilbert/Commonwealth, met with HQ, RFO and EG&G at EG&G on September 30, 1992 for an Independent Cost Estimate (ICE) reconciliation

meeting. The ICE was generated from data used to prepare the RFP ER Program draft baseline in December 1991 and January 1992. Major areas of difference, primarily in the estimated costs for sample analysis and borehole drilling, were discussed, and additional data supporting RFP's cost estimates was provided to the ICE team. The ICE team will analyze the additional data which the team believes will reconcile most of the differences. Results of the additional analysis should be available in three to four weeks.

## Section II - Pondcrete Activities

The FY92 overrun for the Solar Evaporator Pond project will substantially impact FY93 activities. Although detailed analysis is still underway, it appears the only scope alternative that can now be accomplished with current FY93 funding is a termination of the sludge processing effort. Such a termination would produce a large lost-value for work already complete, incur expenses for the termination, and is incompatible with plant goals to remediate the ponds. EG&G is evaluating the funding of selected efforts to preserve a range of options, and continue analyses to support a restructuring of the program in roughly late November. These issues need to be formally shared with the regulatory agencies concurrent with the restructuring analysis.

About two-thirds of the Haliburton subcontractor personnel were placed on unpaid furlough this week due to the year-end funding problems on the Solar Ponds Program. RFO anticipates that Haliburton will be returned to required staffing levels next week under the plant's plan to fund selected project scope through mid-November.

## Section III - Surface Water Management

### Federal Facility Compliance Agreement (FFCA) - Drain Identification Study

Two milestones specified in the Drain Action Plan were met on September 29, 1992. Deliverables included four field evaluation procedures and a field evaluation plan. the procedures also fulfilled a requirement of the Chromic Acid Incident Plan (CAIP) under the National Pollutant Discharge Elimination System (NPDES) FFCA.

### Spill Prevention Control Countermeasures and Best Management Practices (SPCC/BMP) Plan

A final, certified, controlled document, the Spill Prevention Control Countermeasures and Best Management Practices (SPCC/BMP Plan) was delivered to RFO before the October 1, 1992 deadline. The purpose of the SPCC/BMP is to document existing RFP programs and plans which prevent or minimize the potential for significant releases of toxic or hazardous substances from the RFP to waters of the United States. An updated SPCC/BMP is a requirement of the Rocky Flats National Pollutant Discharge Elimination System (NPDES) Permit and will be submitted as part of the RFP Stormwater Permit application.

### Colorado Department of Health (CDH) Split Sampling

The discharge of A-4 pond ended on September 21, 1992. CDH requested that the normal weekly split samples be collected that day. CDH declined our invitation for sampling. On September 29, 1992 CDH collected a predischarge sample from A-4 pond in anticipation of restarting discharge in mid-October.

RFO submitted an individual storm water permit application to EPA on October 1, 1992. Information provided in this application was based upon EPA directives agreed to in a March 1991 meeting and the NPDES storm water regulation requirements. EPA has indicated that RFP will initially receive a general permit because the Agency does not have the resources to evaluate individual permits at this time. A general permit will require RFP to develop and implement a Pollution Prevention Plan (PPP) over the next year. Resources have not been allocated for the PPP. Its potential impact is being evaluated by EG&G.

## Section IV - Transition/Decontamination and Decommissioning

### Section V - Meetings

OU 2 - A meeting is scheduled for October 5, 1992 among RFO, EG&G and the regulatory agencies to discuss the delayed Bedrock field program.

OU 5 - A meeting is scheduled for October 7, 1992 among CDH, EG&G and RFO to discuss Technical Memorandum 1 (TM1), Revised Network Design - Field Sampling Plan.

OU 8 - A comment review meeting was held on September 29, 1992 with EG&G and RFO to discuss the OU 8 Final Phase I RFI/RI Work Plan. The FSP and risk assessment section were reviewed.

OU 12 - A meeting was held September 24, 1992 among the regulatory agencies EG&G and RFO to discuss the proposed FSP for the Industrial Area OUs.

A meeting was held with PR-20 Ice Team to reconcile cost differences in several areas of the EM Baseline.

### Section VI - Future

#### October 1992 IAG Milestones Scheduled for Delivery from RFO to EPA/CDH:

<u>OU</u>	<u>Milestones</u>	<u>Date Due to EPA/CDH</u>
12	Submit Final Phase I RFI/RI Work Plan	Oct. 5, 1992
13	Submit Final Phase I RFI/RI Work Plan	Oct. 12, 1992
14	Submit Final Phase I RFI/RI Work Plan	Oct. 19, 1992
15	Submit Final Phase I RFI/RI Work Plan	Oct. 26, 1992
*01	Submit Final Phase I RFI/RI Work Plan	Oct. 28, 1992
02	Submit Draft Subsurface IM/IRA/ ER Test Plan	Oct. 29, 1992

\*extended from original IAG date of July 30, 1992 with approval from EPA/CHD